

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.
20-cv-04651-SDG

AFFIDAVIT OF SHAMEIKA VAILES

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, Shameika Vailes, who being duly sworn, deposed and stated as follows:

1. My name is Shameika Vailes. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in Fulton County, Georgia.

3. On November 15, 2020, I was present as an observer credentialed by the Democratic Party of Georgia (“DPG”) to observe the statewide hand recount of

ballots cast in the 2020 Presidential Election in Fulton County, Georgia (the “Recount”). As part of becoming credentialed, I received training in what the Recount would entail and what I would expect to observe.

4. I arrived at the Georgia World Congress Center, where the Recount was held, at approximately 8:00 a.m.

5. On arrival, I had no problems accessing the Center where the Recount was happening, though I was unable at first to locate and connect with fellow credentialed observers.

6. Check-in went smoothly.

7. After check-in, it took me some time to find the DPG appointed Site Lead. As I asked around seeking where I should go, Fulton County election employees or volunteers shared that a great deal of progress was made in the Recount on Saturday, such that the auditors were nearing completion of the Recount. No one tried to stop me from proceeding, or to get me or anyone else to leave on the premise that the Recount was complete or nearly complete.

8. . The Recount was ongoing when I arrived.

9. By 8:30 a.m., I had connected with the Site Lead and fellow observers and learned that there were more DPG-credentialed observers than were permitted to access the floor at that time.

10. The numbers of credentialed observers from DPG and from the Georgia Republican Party appeared to be roughly equal. Both parties appeared to have more credentialed observers present than were permitted to approach the audit teams who were conducting the Recount. Both parties had credentialed observers in the space where the audit teams were conducting the Recount

11. At no time did I see or hear of a credentialed observer being denied access to the Recount, other than for the reason that the observer's political party already had the maximum permitted number of credentialed observers in the space. I observed no disparate treatment by Fulton County elections employees or volunteers of observers credentialed by a particular party, or of members of the public.

12. Around 9:30 a.m., I left the Recount because there were sufficient numbers of DPG-credentialed observers on site and I had other commitments that day.

13. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

14. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 17th day of November 2020.

Shameika Vailes

SHAMEIKA VAILES

Sworn to and subscribed to
before me this 17th day of
November 2020.

Laura Tucker
Notary Public



My commission expires: March 28, 2023